UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

July 20, 1988

Jeffrey H. Teitel
Sequa Corporation
200 Park Avenue
New York, NY 10166

Lawrence Bierlein, P.C.
Bishop, Cook, Purcell & Reynolds
1200 Seventeenth Street, N.W.
Washington, D.C. 20036

Re: EPA RCRA Docket No. I-85-1094

Dear Jeff and Larry:

At our meeting on July 19, 1988, I agreed to send along to you EPA's response to your meeting summary of the May 23, 1988 meeting of our respective technical representatives. Attached please find a mark-up of the summary Jeff provided. The following comments apply to the various marked-up sections of the summary:

1. EPA did not perceive the focus of the meeting to be the February 3, 1988 penalty assessment letter; rather, the Agency perceived the meeting's focus to be upon comments regarding the Phase I study report.

2. EPA representatives do not recall discussing the topic of time delays.

3. While not taking issue with the term "brief description" as used in this text, EPA would like to clarify its understanding that the description of technologies be of sufficient detail to lead to informed decisionmaking.

4. EPA's recollection is that a request was made to audit the interior of the facility, a request for something significantly broader than wipe samples.

I have included with this letter a proposed summary of the meeting composed by Mary Garren. I would appreciate your reviewing it and letting me know if there are any perceived inaccuracies. It appears to me that both sides are in fundamental agreement on the substance of the May 23 meeting. I am hoping we can resolve any outstanding differences regarding our summaries of that meeting and forge ahead to the larger issue of site remediation. In that vein, you will recall that we

discussed at our meeting of July 19 possible routes of how best to achieve our respective objectives. We agreed to discuss with our technical staffs the possibility of focusing on final remedial action for the site and, if feasible, adjusting the Phase II studies toward that end. I will be discussing this with Mary Garren shortly and will let you know the results of our discussions. I believe we all also agreed that the status of the penalty demand letter would be reexamined once the next phase of activities was defined. This definition would occur at a meeting to be held upon EPA's review of the final Phase I report, probably sometime in late August or early September.

I appreciate your cooperation in moving this project toward a mutually beneficial conclusion.

Sincerely,

William Walsh-Rogalski

William Walsh-Rogalski
Assistant Regional Counsel

cc: Mary Garren

EPA, Sun Chemical Coporation and
Carroll Products, Inc. Meeting of
May 23, 1988
MEETING SUMMARY

I. Introduction

A. The purpose of this meeting held at EPA Region I offices was to discuss Sun Chemical Corporation ("Sun/Sequa") and Carroll Products, Inc. ("Carroll") compliance with a January 24, 1986 Consent Agreement with EPA. This meeting follows EPA's February 3, 1988 letter to Sun/Sequa and Carroll alleging, "two periods of non-compliance with the provisions of the Consent Agreement regarding the Phase I study at Wood River Junction, R. I."

Key letter not discussed at meeting

B. Persons Attending and Affiliation

(1) Mary Garren, EPA

(2) Mary Jane O'Donnell, EPA

(3) James McCaughey, R. I. DEM

(4) Michael Kulbersh, CDM FPC

(5) Page Embry, CDM FPC

(6) William Swanson, CDM FPC

(7) Ralph Preble, CDM FPC

(8) Robert Iuliucci, Sun/Sequa

(9) Michael Powers, GZA

(10) Gregory Gardner, GZA

II. Meeting Substance

A. Overview

On May 23, 1988, representatives from EPA (Region 1), R.I.DEM,CDM FPC, SEQUA and GZA, the technical on-site consultant, met to discuss compliance with the terms of the above referenced Consent Order involving the Wood River Junction facility, Wood River Junction, Rhode Island. The meeting opened with a GZA overview and slide presentation on-site history and conditions. The general format for the remainder of the meeting was an item by item discussion of CDM FPC's review of GZA's Phase I report (April 1988).

B. Issues and Agreements

not true

The focus of the meeting was the requirements of EPA's February 3, 1988 penalty letter and the terms of the January 24, 1986 Consent Order which included, the requirements of the administrative order; an amended Phase I report to be submitted to EPA by August 1, 1988, and reflecting input generated during the May 23, 1988 meeting; a GZA outline submission of the August amended report to EPA by June 14, 1988; and GZA submission to EPA of a copy of ERT's revised report (1985).

this topic not discussed

Discussion concerning alleged time delays by Sun/Sequa and Carroll for compliance suggested that these delays began from the time after the Work Study Plan (WSP) was approved. The exact reason for the delays was not discussed. The primary issue was whether the EPA approved WSP needed to be amended. An obvious handicap was that none of the current EPA/CDM staff were party to the drafting of the WSP, and therefore, not aware of the existence of, or the situation leading up to the preparation of the revised ERT Report (1985). It was agreed that GZA would resubmit a revised Phase I Report, dated April 29, 1988.

I don't remember this being discussed.

GZA opined that site conditions do not warrant the study effort required by a formal RI/FS. EPA did not address what remedial action would be acceptable to the EPA. GZA estimated that total remediation costs are estimated at between $600,000 and $1,000,000.

It did become clear that the EPA was not willing, based on existing data, to consider the on-site sludge to be a solid waste or to accept a no action alternative for groundwater remediation.

EPA stated that it had not reviewed the ERT Revised 1985 Report. EPA wanted more information relating to past operations and disposal to a lagoon which Sun/Sequa stated were not available.

Sun/Sequa stated that it will revise the Phase I report to include the location of off-site wells which have previously shown contamination. Sun/Sequa stated that it will also submit in the Revised Phase I report, a section or sections which specifically address identified data gaps. This will be separated into pre-1987 study data gaps and existing data gaps. EPA requested Sun/Sequa to identify what substances at the site exceed existing groundwater quality criteria, and what are the criteria. EPA agreed that the Phase I reporting will include statements of fact but will not include a formal risk of endangerment assessment. EPA also agreed that Sun/Sequa will include in the Revised Phase I Report, brief description of technologies appropriate to site remediation and types of Phase II studies will be required to make a final selection. EPA requested and Sun/Sequa agreed to a more detailed discussion of waste disposal practices, if available, in the Phase I Report. GZA stated that very limited information is available regarding waste disposal practices.

Did we ask for this?

Did we agree to this? NO

A few very specific reporting requirements, (such as the number of geologic cross-sections required) were identified by EPA. These are to be included in the August 1988 report.

interior audit

EPA asked Sun/Sequa to perform wipe tests inside the facility building. Sun/Sequa explained that this was not possible for purposes of the Consent Order since this was an active operation of Carroll, simply not appropriate for this testing.

B. The following timetable was agreed upon:

(1) On June 14, 1988, GZA will submit a letter to cover a review of items to be included in the resubmittal of Phase I.

(2) Beginning July 1, 1988 and the first of each month thereafter, monthly project report to be submitted by GZA.

(3) August 1, 1988 due date for GZA to submit a revised Phase I Report.

(4) The Turf Farm Monitor Well will be resampled and results submitted in the reissued report (~~due as a Phase II task~~).

√ revised Phase I due in August

MEETING SUMMARY

I. Introduction

A. Meeting Topic - Progress of Wood River Junction Study and compliance with consent order I-85-1094.

B. Date and Time - May 23, 1988; 1:00 - 4:30 p.m.

C. Location - U.S. EPA, 90 Canal St., Boston, MA

D. Persons Attending and Affiliation
(1) Mary Garren, EPA
(2) Mary Jane O'Donnell, EPA
(3) James McCaughey, RI DEM
(4) Michael Kulbersh, CDM FPC
(5) Paige Embry, CDM FPC
(6) William Swanson, CDM Inc.
(7) Ralph Preble, CDM Inc.
(8) Robert Iuliucci, Sun/Sequa
(9) Michael Powers, GZA
(10) Gregory Gardner, GZA

II Meeting Agenda and Issues Discussed

A. Introductions

B. GZA/Sequa presentations on site history and Phase I study. Slides and maps were used to describe units onsite, well locations, and features of surrounding area. Historical perspective of the site was presented as background.

C. EPA/CDM provided GZA with Agency comments on the Draft Phase 1 Report on April 11, 1988. In a submission on May 13, 1988, GZA responded to those comments and to additional EPA concerns expressed in a letter of May 5, 1988. The focus of the meeting was an item by item response to GZA's May 13th response to EPA's original comments. Based on discussions that took place during the meeting, EPA's positions on the items discussed were modified and provided in writing to GZA on June 2, 1988. Those revised comments are attached and serve as a detailed summary of the points discussed during the meeting.

D. General issues discussed during the meeting:

* Revised ERT Report (1985). GZA agreed to sent the Agency a copy.

* Location of Area drinking water wells in relation to the facility. Needs clarification.

* GZA hopes to view sludge in lagoons as a solid non-hazardous waste and isolate sludge that fails EP-Toxicity. EPA not willing to consider based on insufficient data.

* Merits of dissolved metals vs. total metals vs. total recoverable metals in groundwater analysis.

* GZA estimate of approximately 6000 yd3 of contaminated soil with on-site disposal costs ranging $300,000 - $400,000 and off site disposal costs of $600,000 - $700,000.

* GZA felt site conditions do not warrant the study effort required by a formal RI/FS. EPA disagrees and is insistent that the requirements of the Consent Order be fulfilled.

* EPA indicated that an audit of the interior of the buildings onsite is desired. Sequa refused claiming the audit was not appropriate and that Carroll is an active site due to the iron oxide blending operation that exists there.

E. Agreements reached during the meeting:

(1) On June 14, 1988, GZA will submit a letter to cover a review of items to be included in the resubmittal of Phase I.

(2) Beginning July 1, 1988 and the first of each month thereafter,a monthly project report is to be submitted by GZA.

(3) August 1, 1988 due date for GZA to submit a revised Phase I Report.

(4) The Turf Farm Monitor Well will be resampled and results submitted in the revised Phase I Report due August 1, 1988.

RESPONSE TO COMMENTS
CARROLL PRODUCTS
TECHNICAL REVIEW

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	:	887
EPA Region	:	I
Site No.	:	RID002042216
Contract No.	:	68-01-7331
CDM Federal Programs Corporation Document No.	:	T887-R01-DR-BZVX-1
Prepared By	:	CDM Federal Programs Corporation
Work Assignment Project Manager	:	Michael Kulbersh
Telephone No.	:	(617) 742-2659
Primary Contact	:	Mary Garren
Telephone Number	:	(617) 573-9613
Date Prepared	:	May 27, 1988

TABLE OF CONTENTS

1.0 INTRODUCTION

CDM Federal Programs Corporation (CDM FPC) in conjunction with Camp Dresser & McKee Inc. (CDM Inc.) reviewed the revised Phase I report entitled "Wood River Junction Facility, Wood River Junction, Rhode Island" and Goldberg-Zoino Associates' response to EPA/CDM FPC comments on the Phase I report. The revised report was prepared for SEQUA Corporation (formerly Sun Chemical Corporation) and Carroll Products, Inc. in response to an Administrative Order (RCRA Docket No. I-85-1094), dated January 24, 1986. Carroll Products, Inc. and SEQUA Corporation have agreed to assume the responsibility of performing the investigation of the Wood River Junction facility.

The following sections present CDM FPC's response to GZA's response to CDM FPC comments on the Phase I report.

2.0 REVIEW OF TASKS LISTED IN THE WORK PLAN

1.a. Evaluate existing information.

CDM: A detailed analysis and interpretation of the pre-existing data was still not included. We feel this is necessary and would perhaps serve as the justification required for some of the instances where GZA says no further action is required. Specifically, as GZA attributes some contamination to the UNC plume, a discussion of the UNC plume is requested.

1.b. Identify data gaps.

CDM: The analysis of the pre-existing data would indicate the places where more study was required to successfully characterize the extent and degree of contamination attributable to the Carroll Products facility. Therefore, a presentation of GZA's interpretation from the pre-existing data and their rationale for planning the Phase I tasks should indicate the data gaps they thought needed to be filled. For Phase II, an assessment of the results from the Phase I investigation will yield what further work is required to successfully characterize the site and decide the best course for remediation.

1.c. Define the extent of the presence and release of any substances (presumably toxic or hazardous substances).

CDM: LSED 9 (Lagoon sediment sample) exceeded the MCL for lead (5.0 ppm); a concentration of 5.36 ppm was detected. VOC concentrations were found above the detection limits in water samples from two wells, MW-1004 and MW-1006. MW-1004 had 26 ppb chlorobenzene; there is no MCL or MCLG for this contaminant. Where no MCL or MCLG exists the health based standard should be used. The health based criterion for

chlorobenzene is 1000 ppb. In MW-1006 1,1-dichloroethylene (29 ppb) exceeded the MCL (7 ppb), trichloroethylene (180 ppb) exceeded the MCL (5 ppb) and vinyl chloride (10 ppb) exceeded the MCL (2 ppb). Also, trans-1,2-dichloroethylene (53 ppb) and tetrachloroethylene (470 ppb) exceeded the detection limits; there are no MCLs or MCLGs for these compounds. The health based criterion for carcinogens for tetrachloroethylene is 6.9 ppb. Metals in water samples from the six wells showed levels greater than the MCL in five of the six wells, including MW-1001 the upgradient well, using the total metals method, the same method used to set the drinking water standards; however, none exceeded the MCL using the dissolved metals analyses (pg. 21 revised GZA report).

1.d. Identify the nature and extent of the hazard to public health and the environment from findings in (1.c.).

CDM: This needs to be addressed in Phase II.

2. Delineate, both on- and off-site, composition and concentration of waste originating at the site.

CDM: See 1.a.

3. Type and extent of remedial alternatives to be determined.

CDM: Better delineation of ground-water flow may substantiate that there are no human receptors as all ground-water discharges to the Pawcatuck River. The stream elevations and ground-water elevations need to be presented from several times during the year to support that the flow never reverses. Also, the nearest wells used for potable water should be indicated. GZA states that lenses etc. may cause ground water to be deflected considerably downstream before discharging to the Pawcatuck River. Are there any wells within that area or has that area been defined or some limits put on it? Also, the southern lagoon is contiguous with wetlands, what impact might the lagoons have on these wetlands? These factors need to be better defined before a remedial alternative can be chosen.

4. Identify potential remedial alternatives and evaluate each for appropriateness and applicability.

CDM: The site's contamination and hazard potential has not yet been adequately defined. Remedial alternatives should be presented in the Phase II report.

5. Recommend the most appropriate remedial action or combination of actions to mitigate the threat from wastes on the site.

CDM: See above (4.).

6. Identify scope of additional services, etc.

CDM: This should be discussed at the May 23, 1988 meeting.

3.0 LIST OF TASKS INCLUDED IN THE ADMINISTRATIVE ORDER OF CONSENT AND NOT INCLUDED IN THE PHASE I REPORT

EPA: Review of pre-existing data;

CDM: This information is required in the order (page 11). A detailed analysis and interpretation of the pre-existing data was still not included. We feel this is necessary and would perhaps serve as the justification required for some of the instances where GZA says no further action is required. Specifically, as GZA attributes some contamination to the UNC plume, a discussion of the UNC plume is requested.

EPA: Past disposal practices;

CDM: This information is required in the order (page 11). More detail would be useful, particularly a description of the amount, frequency and type of waste that went to the lagoons. Also, a discussion of the derivation of the contamination behind the Tin Shed would be helpful.

EPA: Waste quantities disposed;

CDM: This information is required in the order (page 11). In GZA's response they say this information was included in the introduction of Section 5.00 and in Section 5.10 (page 3) of the revised report. CDM FPC did not find this information.

EPA: Topographic features and pertinent hydrologic information:

CDM: This information is required in the order (page 11). The hydrologic information required should be fulfilled by comments that will be addressed elsewhere; a further delineation of topographic information is not required.

EPA: Fate of contaminants on the site;

CDM: Correct. The Phase II report will be the appropriate place to address this.

EPA: Areas of recharge;

CDM: This information is required in the order (page 12). If one is concerned only with background concentrations one well is sufficient; however, if one is concerned that any contamination may be deriving from off-site then another well is required. Also, according to EPA MW-1001 is damaged due to nearby construction.

EPA: Interconnectedness of aquifers;

CDM: This information is required in the order (page 12). GZA has not adequately defined or presented in the Phase I report the information that leads the to the conclusion that they can ignore any other unit. ERT (1984) notes that the bedrock is fractured and capable of yielding water at a rate of five gallons per minute or less. This aquifer and its relationship to the surficial aquifer should be addressed by GZA.

EPA: Two cross sections at right angles showing the extent of all hydrological units as well as several other factors;

CDM: This is included in the order (page 12) and should help back up GZA's assumptions about the hydrology of the site.

EPA: Well or piezometer hydrographs;

CDM: See above (page 13 of the order).

EPA: Identification of man-made influences such as water supply wells, (and their approximate pumping schedule), pipes, ditches, etc.;

CDM: This is included in the order (pages 13 and 14). The affect of any municipal supplies or production wells on ground-water flow should be defined. For example what affect does the Carroll Products production well have on ground-water flow, if it is still active?

EPA: Mobility, persistence, etc. of reaction products in the unsaturated zone;

CDM: Agreed. This should be discussed at the May 23, 1988 meeting. This should be addressed in the Phase II report.

EPA: Site specific water chemistry (including at least major anions and cations;

CDM: This is included in the order (page 16). GZA states that site specific water chemistry is not required in the work study plan which was developed under EPA direction.

4.0 SPECIFIC COMMENTS ON REPORT SECTIONS

Section 3.00 Scope of Work

CDM:

a. CDM would like to obtain a copy of ERT (1985). Are monitoring wells CHW 517 - 519, 522 and 523 located southeast of the Pawcatuck River (page 7, Work Study Plan) or approximately 1800 feet southwest of building 7, or both? Also, a map indicating all wells for which data is listed in the Phase I study would be very useful.

CDM:

b. See Section d. below.

CDM:

c. This answer is insufficient. A more detailed explanation or documentation of waste disposal practices is required. This falls under the discussion of past disposal practices required by the order (page 11).

CDM:

d. The rationale for attributing the contamination in this well (RIW-642) to the UNC plume needs to be discussed by GZA, particularly as according to the ERT (1984) map this well is located northwest of the Pawcatuck River, on the Carroll Products side. If ground water discharges to the river from both sides of the river and the well is indeed northwest of the river, what is the rationale for attributing the contamination to UNC? Referencing Ryan and Kipp (1984) is not sufficient.

CDM:

e. Contaminants found previously in the Carroll Products wells were mentioned; however, GZA still needs to determine if contamination is still present.

Section 5.00 Site History

CDM:

CDM does not see this information in Section 5 Site History of the revised report.

Section 5.30 Hydrogeology

CDM:

At least two geologic cross sections at right angles to each other are required as per the order (page 13).

Section 5.31 Flow characterization

CDM:

Permeability tests were required in the order (page 14) and GZA stated in the Work Study Plan (page 11) that they would perform permeability tests. The gradation tests included in Appendix E of the revised work plan are insufficient to characterize permeability; they might be used to substantiate a permeability test. GZA does present the hydraulic conductivity from Ryan and Kipp (1984) but these numbers are not in agreement with those found from the gradation tests.

CDM:

Considering the large number of wells in the area, it would be relatively easy to obtain sufficient ground-water elevation data to confirm the ground-water flow direction. Also, to substantiate that ground water is discharging to the stream, stream levels need to be obtained on the same day as the ground-water levels. An additional well cluster to help define vertical gradients would also be helpful in defining ground-water flow. Water levels should be taken at several times during the year to ensure that ground-water flow does not reverse.

CDM:

As per the order (page 12), areas of recharge and discharge must be defined.

CDM:

The data from Ryan and Kipp (1985), i.e. the average water table altitude, the "other hydraulic parameters" and the "aquifer properties" (page 7 revised report) should be supplied.

Section 7.10 Test Boring

CDM:

The Meadow Brook Pond analyses are included in the revised report but the sample, according to the table in Appendix G, was not taken until April 22, 1988, after construction of the wells.

Section 7.20 Monitoring Well Installation

CDM:

Adequate.

CDM:

Adequate.

CDM:

Although this method is probably fine, it is insufficient to say that Mr. Harrington did not protest. GZA should have noted in the field log that Mr. Harrington okayed or ordered this method.

CDM:
Adequate.

Section 8.00 Subsurface Conditions

CDM:
Adequate. They added a paragraph on the gradation tests and note that Ryan and Kipp's (1985) in-situ pump test results are probably more reliable.

Section 8.10 Glacial Outwash Deposits

CDM:
Stating that Mr. Harrington did not object is insufficient. The presence of staining would suggest that this might be a likely location for one of the "at least two" locations chosen for sampling and analysis of priority pollutants and metals as per the Work Study Plan (page 12). Also, the mapping of stained areas and the auger boring(s) in the swale west of the main building as stated in the Work Study Plan (page 12) were not completed.

Section 8.20 Groundwater Conditions

CDM:
Adequate.

Section 9.10 Soil

CDM:
Agreed.

Section 10.00 Results of Analyses

CDM:
Okay. In future EPA SW-846 third edition should be used.

Section 10.10 Soil

CDM:
Adequate.

CDM:
The results of the VOC screenings at the locations other than the wells should also be included in the report. CDM was only able to find results from the monitoring well installation.

CDM:
Adequate.

CDM:
Adequate.

Section 10.10 Soil, 10.20 Surficial Soil

CDM:
Metals could be requested in Phase II as could a complete Appendix IX priority pollutant scan as the activities and contaminants generated or used by the Warwick Chemical Company are not included. Particularly, as the facility has been active for so many years, PCBs should be analyzed. Likely locations might be behind the Tin Shed or in one of the various tank locations listed on pages 4 and 5 of the revised report.

Section 10.41 VOCs

CDM:
Adequate.

Section 10.42 Metals

CDM:
Adequate.

CDM:
Okay. They are probably correct.

Section 11.00 Conclusions and Recommendations

EPA: -1-

CDM:
Another upgradient well would be useful in defining ground-water flow and if MW-1001 was damaged by the nearby construction, another well would be necessary.

EPA: -2-

CDM:
GZA agreed to this in the Work Study Plan (page 11) and it is required in the order (page 14).

EPA: -3-

CDM:
At least two geologic cross sections at right angles required in the order (page 12).

EPA: -4-

CDM:
This is required in the order (page 12).

EPA: -5-

CDM:
Okay.

EPA: -6-

CDM:
Okay.

EPA: -7-

CDM:
Adequate, but they should explain what they plan on doing to describe the man-made structures and which ones they will describe.

EPA: -8-

CDM:
Adequate.

EPA: -9-

CDM:
Ground-water contour maps, including water elevation data from more wells than used in Phase I and stream level elevations, need to be completed for different times of the year to indicate that ground water consistently discharges to the stream. Also, another well cluster would be useful.

EPA: -10-

CDM:
Adequate. The extent of soil sampling required in Phase II can be discussed at the May 23, 1988 meeting.

EPA: -11-

CDM:
Okay.

EPA: -12-

CDM:

On a site visit EPA personnel noted that the interior of at least one of the facility buildings was an area of concern. This should be addressed.

EPA: -13-

CDM:

In addition CDM suggests that the table include contaminants below the MCL with a note that they were found below the MCL. For those contaminants for which there is no MCL, or MCLG, the health-based standard should be used.

EPA: -14-

CDM:

Okay.

EPA: -15-

CDM:

This should be discussed at the May 23, 1988 meeting.

NOTE: A complete priority pollutant scan, if indeed none has been done, should be done. The lagoon sediments, MW-1006, and the stained area behind the Tin Shed seem to be likely locations.

NOTE: On page seven, bullet 2 of the revised report GZA states that silver exceeded the MCL in the on-site well with a concentration of 0.013 ppm; the MCL for silver is 0.5 ppm.

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Boston, MA 02203
(Street or P.O. Box)

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Mr. Lawrence Bierlein
Bishop, Cook, Purcell & Reynolds
1200 Seventeenth Street, ~~S.W.~~ N.W.
Washington, D.C. ~~20036~~

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V. [illegible]

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7a. **EMPLOYEE'S INITIALS**

PS Form 3811, Dec. 1990

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TOTAL $___

3. **ARTICLE ADDRESSED TO:**
Mr. Robert Iuliucci
Sequa Corporation, Hillcrest Towers
7162 Reading Road
Cincinnati, OH 45237

4. **TYPE OF SERVICE:**
   - ☐ REGISTERED ☐ INSURED
   - ☒ CERTIFIED ☐ COD
   - ☐ EXPRESS MAIL

ARTICLE NUMBER
P-624 563 073

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5. **DATE OF DELIVERY**
3-25-88

POSTMARK

6. **ADDRESSEE'S ADDRESS** *(Only if requested)*
Bob Iuliucci

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS**